

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

LACIE EDON,)
Plaintiff,)
vs.)
PNC BANK, in its own capacity and as) Civil Action No. 1:24-cv-02195-TWP-KMB
Successor to NATIONAL CITY BANK,)
Defendant.)

PLAINTIFF'S PRELIMINARY WITNESS AND EXHIBIT LIST

Plaintiff, Lacie Edon (“Plaintiff”) by counsel, submits the following Preliminary Witness and Exhibit List.

A. WITNESSES

1. Lacie Edon
 2. Cheryl Edon
 3. James Davis
 4. Mary Benson
 5. Representatives of PNC Bank, in its own capacity and as successor to National City Bank (“PNC Bank”)
 6. Any employee of PNC Bank who spoke with Plaintiff or her parents
 7. Any person who withdrew funds belonging to Plaintiff
 8. Any person identified in discovery
 9. Any witness listed on Defendant’s Witness and Exhibit List
 10. Any witness discovered through further investigation and/or discovery
 11. Any persons identified in documents produced by the parties
 12. Any person identified in depositions taken in this case.

13. All persons needed for impeachment or rebuttal purposes

14. All witnesses needed to authenticate records

B. EXHIBITS

1. All bank records for any account in which Plaintiff's settlement funds were deposited
2. All communications between PNC Bank and Plaintiff or her parents
3. All settlement agreements related to the settlement funds paid to Plaintiff
4. All PNC Bank Documents related to UTMA accounts or similar accounts
5. All discovery responses, deposition transcripts, and pleadings in this matter
6. All documents discovered through further discovery
7. Any evidence needed for impeachment

Respectfully submitted,

WOOTON HOY, LLC

/s/ Lewis S. Wooton
Lewis S. Wooton, #26650-49

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CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2025, a copy of the foregoing was served on all counsel of record by using the Court's IEFS System:

/s/ Lewis S. Wooton
LEWIS S. WOOTON

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